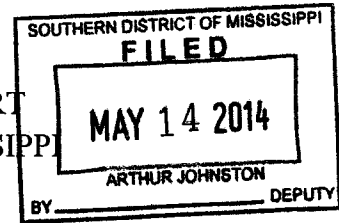


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



UNITED STATES OF AMERICA

v.

BOOKER TARVIN
SHARON GIBBS
SHAMIKA FULFORD
BIANCA HARRIS

CRIMINAL NO. *3:14CR91 DCB-LRA*
18 U.S.C. § 371
18 U.S.C. § 641
18 U.S.C. § 1028A
18 U.S.C. § 1709

The Grand Jury Charges:

At all times relevant to this indictment:

1. The Internal Revenue Service ("IRS") was an agency of the United States Department of the Treasury responsible for enforcing and administering the federal tax laws of the United States, which includes collecting taxes owed to the United States and paying income tax refunds in the form of electronic bank deposits to the citizens of the United States.

COUNT 1

2. From in or around January 2011, and continuing until at least January 2013, in Hinds County in the Northern Division of the Southern District of Mississippi and elsewhere, the defendants **BOOKER TARVIN, SHARON GIBBS, SHAMIKA FULFORD and BIANCA HARRIS**, did unlawfully, voluntarily, intentionally and knowingly conspire, combine, confederate, and agree together and with other individuals both known and unknown to the Grand Jury to defraud the United States for the purpose of impeding, impairing, obstructing, and defeating the lawful government functions of the IRS of the Treasury Department in the ascertainment, computation, assessment, and collection of the revenue: to wit, income taxes.

3. From on or about those same dates, in Hinds County in the Northern Division of the Southern District of Mississippi and elsewhere, the defendants **BOOKER TARVIN, SHARON GIBBS, SHAMIKA FULFORD and BIANCA HARRIS**, did knowingly conspire with each other and with others known and unknown to the Grand Jury, to commit offenses against the United States as follows:

a. Theft of Government Funds in violation of Section 641, Title 18, United States Code;

b. Theft of Mail in violation of Section 1709, Title 18, United States Code.

4. The purpose of the conspiracy was to defraud the United States by filing false income tax returns using the names of individuals ("the victims") without authority to do so, which claimed income tax refunds to which the unindicted co-conspirators and the defendants **BOOKER TARVIN, SHARON GIBBS, SHAMIKA FULFORD and BIANCA HARRIS**, were not entitled.

5. It was a part of the conspiracy that the defendants **BOOKER TARVIN, SHARON GIBBS, SHAMIKA FULFORD and BIANCA HARRIS**, and others known and unknown to the grand jury would prepare, or cause to be prepared, false income tax returns using the names, social security numbers and other identification information of the victims without their permission.

6. It was also a part of the conspiracy that the defendants **BOOKER TARVIN, SHARON GIBBS, SHAMIKA FULFORD and BIANCA HARRIS**, and others known and unknown to the grand jury would falsely identify income amounts for purported taxpayers. The defendants **BOOKER TARVIN, SHARON GIBBS, SHAMIKA FULFORD and BIANCA HARRIS** and others known and unknown to the grand jury would also falsely report that taxes

were withheld from this fictitious income in excess of the tax purportedly owed, so that a refund would be issued by the IRS.

7. It was also a part of the conspiracy that defendants **BOOKER TARVIN, SHARON GIBBS, SHAMIKA FULFORD and BIANCA HARRIS** would collect tax refunds via United States Treasury Checks and stored value cards issued by the United States Treasury based on the fraudulent tax returns filed in the names of the victims, and that these United States Treasury Checks were directed to mailing addresses accessible to the defendants **BOOKER TARVIN, SHARON GIBBS, SHAMIKA FULFORD and BIANCA HARRIS**.

8. It was also a part of the conspiracy that the defendant **BOOKER TARVIN** would cause fraudulently obtained tax refund checks and stored value cards to be mailed to various addresses in the 39204 zip code.

9. It was also a part of the conspiracy that the defendant **SHARON GIBBS**, a United States mail carrier, would collect the fraudulently obtained tax refund checks, stored value cards, and other mail parcels from her assigned mail route, which covered part of the 39204 zip code, and divert those parcels to the defendant **BOOKER TARVIN** and others.

10. In furtherance of the conspiracy, and to accomplish its objectives, defendants **BOOKER TARVIN, SHARON GIBBS, SHAMIKA FULFORD and BIANCA HARRIS** and others known and unknown to the Grand Jury, committed various overt acts, including but not limited to the following:

11. On or about February 19, 2013, the defendant **SHAMIKA FULFORD**, filed a fraudulent income tax return with the IRS in the name of victim E.B.

12. On or about January 31, 2013, the defendant **SHAMIKA FULFORD**, filed a fraudulent income tax return with the IRS in the name of victim J.B.

13. On or about January 28, 2013, the defendant **SHAMIKA FULFORD**, filed a fraudulent income tax return with the IRS in the name of victim S.F.

14. On or about February 18, 2013, the defendant **SHAMIKA FULFORD**, filed a fraudulent income tax return with the IRS in the name of victim A.N.

15. On or about February 6, 2012, the defendant **BOOKER TARVIN**, caused to be filed a fraudulent income tax return with the IRS in the name of victim P.D.

16. On or about February 29, 2012, the defendant **SHARON GIBBS**, took from the United States mails, a fraudulently obtained federal income tax refund check obtained as a result of the fraudulent income tax returns submitted with the name of victim P.D. Said refund check had been mailed to an address on Cox Street, in Jackson, Mississippi, with zip code 39204.

17. On or about August 23, 2011 and on or about January 16, 2012, the defendant **BOOKER TARVIN**, caused to be filed two fraudulent income tax returns with the IRS in the name of victim L.M.

18. The fraudulent returns filed in the name of L.M. contained a fraudulent mailing address on Cox Street in Jackson, Mississippi, in the 39204 zip code. As a result of the fraudulent returns, a mailing from the IRS was generated, and was subsequently intercepted by the defendant **SHARON GIBBS** for the purpose of delivering the mailing to the defendant **BOOKER TARVIN**.

All in violation of Section 371, Title 18, United States Code.

COUNTS 2-5

19. On or about the dates listed below, in Hinds County in the Northern Division of the Southern District of Mississippi and elsewhere, the defendants, **BOOKER TARVIN and SHAMIKA FULFORD**, aided and abetted by each other and by others known and unknown to

the Grand Jury, did steal, purloin and knowingly convert to their own use and to the use of another, greater than \$1,000.00 in funds belonging to the United States of America by receiving federal tax refunds in the names of the individuals listed below, to which defendants **BOOKER TARVIN and SHAMIKA FULFORD** knew they were not entitled.

COUNT	VICTIM	AMOUNT	DATE REFUND ISSUED
2	E.B.	\$1,731.00	5/30/2012
3	J.B.	\$1,529.00	2/13/2013
4	S.F.	\$1,589.00	2/13/2013
5	A.N.	\$1,729.00	2/27/2013

In violation of Sections 641 and 2, Title 18, United States Code.

COUNTS 6-13

20. That on or about each of the dates listed below, in Hinds County in the Northern Division of the Southern District of Mississippi and elsewhere, the defendants, **BOOKER TARVIN and SHAMIKA FULFORD** aided and abetted by others known and unknown to the Grand Jury, knowingly used without lawful authority a means of identification of another person, during and in relation to a violation of Section 641, Title 18, United States Code, to wit, theft of public money.

COUNT	TAX YEAR	VICTIM	DATE TAX RETURN FILED
6	2011	E.B.	1/16/2012
7	2012	E.B.	2/19/2013
8	2011	S.F.	4/9/2012
9	2012	S.F.	1/28/2013

10	2011	J.B.	4/9/2012
11	2012	J.B.	1/31/2013
12	2011	A.N.	2/29/2012
13	2012	A.N.	2/18/2013

All in violation of Sections 1028A and 2, Title 18, United States Code.

COUNT 14

21. On or about December 3, 2013, in Hinds County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **SHARON GIBBS**, being an employee of the United States Postal Service, did wrongfully remove and embezzle one first class mail piece and its contents, specifically \$100 in United States Currency, which had been entrusted to her and which had come into her possession intended to be conveyed by mail.

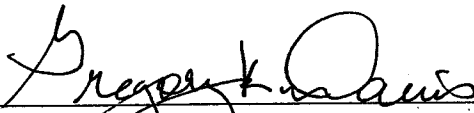
In violation of Sections 1709 and 2, Title 18, United States Code.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

22. As a result of committing the offenses alleged in this Indictment, the defendants shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses. Further, if any property described above, as a result of any act or omission of the defendants: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the

defendants, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Section 981(a)(1)(C), Title 18, United States Code and Section 2461, Title 28, United States Code.


GREGORY K. DAVIS
United States Attorney

A TRUE BILL:
S/SIGNATURE REDACTED
Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on this the 14th day of May, 2014.


UNITED STATES MAGISTRATE JUDGE